

DAVIS POLK & WARDWELL LLP

450 LEXINGTON AVENUE
NEW YORK, NY 10017

212 450 4000
FAX 212 701 5800

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ARTHUR J. BURKE
212 450 4352

June 28, 2018

Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, 11-md-2262 (NRB)

Via ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge Buchwald:

We write on behalf of the Defendants in the above-captioned litigation to request a modification of interim deadlines relating to Plaintiffs' amended complaints and motions for leave to file amended complaints.¹ Dkt. No. 2513. Under the Defendants' proposed revised schedule, briefing would still be completed within the 70 day time period requested by this Court. Dkt. No. 2507. Plaintiffs do not oppose this request.

On May 7, 2018, the Court directed the parties "to submit a (hopefully agreed upon) schedule for the filing of amended complaints and accompanying motions," with the schedule condensed to "allow for no more than 70 days between the first and fourth deadlines." Dkt. No. 2507. On May 11, 2018, the parties jointly proposed the following briefing schedule, so ordered on May 14, 2018: (1) Plaintiffs file Amended Complaints and Motions for Leave to File Amended Complaints by June 15, 2018; (2) Defendants file Motions to Dismiss Amended Complaints or Oppositions to Motions for Leave to File Amended Complaints by July 10, 2018; (3) Plaintiffs file Oppositions to Motions to Dismiss Amended Complaints or Replies to Motions

¹ Each Defendant joins this letter to the extent (and only to the extent) that such Defendant is currently a non-dismissed defendant named in any action (including any stayed action) within the MDL. By joining this letter, no Defendant consents to personal jurisdiction or venue in any action, including any action where (i) that defense has been asserted, (ii) a Defendant has not had an opportunity to assert that defense, including in the stayed cases, or (iii) the Court dismissed a claim against Defendants before a personal jurisdiction defense became available. Defendants also expressly reserve all jurisdictional defenses available to them, including jurisdictional objections to discovery.

for Leave to File Amended Complaints by August 6, 2018; and (4) Defendants file Replies to Motions to Dismiss Amended Complaints by August 24, 2018. Dkt. Nos. 2510, 2513.

After Plaintiffs filed their Amended Complaints and Motions for Leave to File Amended Complaints on June 15, 2018, Defendants proposed, and Plaintiffs did not oppose, the following modification of the interim deadlines: (1) Defendants file Motions to Dismiss Amended Complaints or Oppositions to Motions for Leave to File Amended Complaints by July 13, 2018 (instead of July 10, 2018); (2) Plaintiffs file Oppositions to Motions to Dismiss Amended Complaints or Replies to Motions for Leave to File Amended Complaints by August 9, 2018 (instead of August 6, 2018); and (3) Defendants file Replies to Motions to Dismiss Amended Complaints by August 24, 2018.

Defendants respectfully request that the Court modify the briefing schedule as set forth herein.

Respectfully submitted,

/s/ Arthur J. Burke
Arthur J. Burke

cc: All parties via ECF

So
ordered
Hami
Reice
Buchwald
6/28/18